

EXHIBIT J  
DEFENDANTS' VOIR DIRE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

Midas Green Technologies, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 6:22-CV-00050-ADA
	)	
Rhodium Enterprises, Inc.;	)	
Rhodium Technologies LLC;	)	
Rhodium 10MW LLC;	)	<b>JURY TRIAL DEMANDED</b>
Rhodium 2.0 LLC;	)	
Rhodium 30MW LLC;	)	
Rhodium Encore LLC;	)	
Rhodium Renewables LLC;	)	
Rhodium Renewables Sub LLC; and	)	
Rhodium Ready Ventures LLC,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' PROPOSED VOIR DIRE  
QUESTIONS TO BE ASKED BY THE COURT**

Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10MW LLC, Rhodium 2.0 LLC, Rhodium 30MW LLC, Rhodium Encore LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC, and Rhodium Ready Ventures LLC (“Rhodium”) hereby submit the following proposed questions to be asked by the Court during *voir dire*. Defendants reserve the right to amend or supplement these proposed questions as necessary to conform to the evidence and ultimate issues at trial, to conform to the results of the pretrial conference, and in response to any future Court filings or orders.

1. In the trial of this case, the parties are entitled to have a fair, unbiased, and unprejudiced jury. If there is any reason why you might be biased or prejudiced in any way, you must disclose such reason when you are asked to do so. It is your duty to make this disclosure.

2. Have you served on a jury in a civil or criminal case or as a member of a grand jury within the last fifteen years?

3. Is there any reason, such as poor vision, difficulty hearing, or difficulty understanding spoken or written English, that would make it difficult for you to serve on this jury?

4. Do you recognize any members of the Court staff; that is, any of the folks along the wall, myself, or anyone sitting at the table in front of me?

5. Do you recognize any of the lawyers who are in the courtroom today?

6. Do you know anyone with any affiliation whatsoever to any of the law firms associated with this case, including:

- a. Thomas Whitelaw & Kolegraff LLP
- b. K&L Gates LLP
- c. Scheef & Stone LLP

- d. Stris & Maher LLP
  - e. Kirkland & Ellis LLP
  - f. Gillam & Smith LLP
7. Do you happen to know anyone else on the jury panel?
8. Have you read or heard anything, from any source, about this case, or have knowledge of it in any way? Have you done any internet research or other searching for information about either Midas Green Technologies, LLC, Rhodium Enterprises, LLC, or any other defendant? If so, what research have you done?
9. Have you heard of or been otherwise acquainted with, related to, done business with, been employed by, or had any dealings with any of the parties, attorneys, or witnesses, including but not limited to:
- a. Christopher L. Boyd
  - b. James P. Koen
  - c. David Christopher Laguna
  - d. Thomas R. Turner
  - e. Kenneth D. Swinden
  - f. Mario Conti Garcia
  - g. John Charles Tribou
  - h. Kenneth Tooke
  - i. Francisco Conti
  - j. Christiaan Best
  - k. Michael Rainone
  - l. Chase Blackmon

- m. Cameron Blackmon
- n. Nathan Nichols
- o. Marshall Long
- p. Nicholas Cerasuolo
- q. Dr. Himanshu Pokharna
- r. Dr. James Lee
- s. J. Duross O'Bryan
- t. Dr. Alfonso Ortega
- u. Juli Saitz

10. Do you have any belief or feeling toward any of the parties, the attorneys, or the witnesses, that might be regarded as a bias or prejudice for or against any of them?

11. Do you own stock in any of the parties or have any interest, financial or otherwise, in the outcome of this case?

12. Have you, or any member of your family or close friends, to your knowledge, ever filed a lawsuit against anyone or had a lawsuit filed against you, or appeared as a witness in any civil or criminal case, excluding a divorce case?

- a. If so, did the lawsuit terminate satisfactorily as far as you were concerned?

13. Have you or any member of your immediate family ever been employed by or had any dealings with a lawyer or the court system?

14. Do you have a strong opinion, positive or negative, about lawsuits or the justice system in general?

15. Do you have a strong opinion, either positive or negative, about the amount of

money awarded by juries in civil cases?

16. Have you or any member of your immediate family ever been employed by, or

had any dealings with, the United States Patent and Trademark Office?

17. Other than military service, have you ever worked for the United States

government?

18. Have your or an immediate family member ever owned a business?

19. Have you invented or deployed any technology yourself, whether as part of your

employment or on your own, or do you know someone who has?

20. Have you or any member of your immediate family ever applied for, or obtained,

a United States or foreign patent?

a. If so, in what field?

b. Was the patent issued?

21. Do you have any familiarity with how the United States patent system works?

22. Do you have any opinions about patents, patent rights, or the United States Patent

and Trademark Office that might make it difficult for you to be a fair and

impartial juror in this case?

23. Do you or does your employer rely on patented technology as part of its business?

24. Do you, your immediate family members, or persons close to you have any

experience with licensing or royalty agreements for intellectual property, such as

patents, copyrights, or trademarks?

25. Have you ever worked for a company that was involved in a patent or other

intellectual property dispute?

26. Have you ever had a negative experience of any type with any party to this case?

27. Do you have any familiarity with cryptocurrency, including for example Bitcoin?
28. Do you have any opinions about cryptocurrency that might make it difficult for you to be a fair and impartial juror in this case?
29. Do you have any familiarity with the industrial-scale cooling of electronic equipment?
30. Do you have a degree or training in science, engineering, computers, or heating, ventilation, and air conditioning? Have you taken any classes related to engineering or heating, ventilation, and air conditioning?
31. Have you, or any member of your family or any of your close friends, ever worked for any of the parties to the case?
32. Are you a member of, or do you hold leadership positions in, any social, political, civic, or religious organizations, clubs, or groups? If so, please identify those organizations, clubs, or groups?
33. Do you feel that that it is simply not your place to have to decide whether a patent is infringed or not?
34. Have you ever served in a focus group or as a mock juror?
  - a. If so, when, and how many times?
  - b. Did the exercise involve patents? Technology?